

EXHIBIT 4

Donna Watson

From: Laura Chapman <LChapman@sheppardmullin.com>
Sent: Thursday, August 01, 2019 2:12 PM
To: W. Kyle Carpenter; Yasamin Parsafar; Mary Tom-Hum
Cc: Robert Pitts; Jake Horton; 'Raymond E. Stephens'; Chad Hatmaker
Subject: RE: ACT v. WIN - Depo Dates

August 12 doesn't work for the Nolte depo but we can defend Nolte on August 5, 7 or 8. Can you tell me asap if those dates work? I have sent an email to Nolte to see if those dates work for him and hoping they do. Let's get Nolte confirmed for a date today asap.

You can use our Century City office for his depo. I just need to reserve a room, which I will ask for once we confirm the date. As for Iowa I would think there is a court reporter office in Cedar Rapids or Iowa City; I know there are a lot of hotels in Iowa City and I would think some have decent conference rooms.

We are not willing to de-designate the Nolte report.

From: W. Kyle Carpenter <kcarpenter@wmbac.com>
Sent: Thursday, August 1, 2019 7:07 AM
To: Laura Chapman <LChapman@sheppardmullin.com>; Yasamin Parsafar <yparsafar@sheppardmullin.com>; Mary Tom-Hum <MTom-Hum@sheppardmullin.com>
Cc: Robert Pitts <rpitts@pl-iplaw.com>; Jake Horton <jhorton@pl-iplaw.com>; 'Raymond E. Stephens' <rstephens@pl-iplaw.com>; Chad Hatmaker <chatmaker@wmbac.com>
Subject: RE: ACT v. WIN - Depo Dates

Laura-

I jumped the gun when I confirmed Nolte for the 9th yesterday. While the 9th is okay, I need to be here on the 10th, and there is no way to get back from LA until late afternoon. I am available any time the next week. Could we possibly do it on the 12th? Ideally I would like to combine Nolte and Arizona so I could do them both on one trip, but I understand that may not be possible (especially since I am begging for relief).

Thanks in advance for your help.

Kyle

From: Donna Watson **On Behalf Of** W. Kyle Carpenter
Sent: Wednesday, July 31, 2019 12:30 PM
To: 'Laura Chapman'; Yasamin Parsafar (yparsafar@sheppardmullin.com); Mary Tom-Hum (MTom-Hum@sheppardmullin.com)
Cc: Robert Pitts; Jake Horton; 'Raymond E. Stephens'; Chad Hatmaker; W. Kyle Carpenter
Subject: ACT v. WIN - Depo Dates

Laura,

This will confirm that we can depose Mr. Nolte on August 9 in Los Angeles and Ms. Martone on August 23 in Iowa. I will take you up on your previous offer to conduct Mr. Nolte's deposition at your Century City office, if that offer still stands. Do you have a suggestion for a location for Ms. Martone?

In accordance with the Protective Order, I would request that you reconsider the designation of Mr. Nolte's Report as "Attorney's Eyes Only." I do not believe that this is an appropriate designation for the Report, and I